



November 15, 2012

Federal Communications Commission
Public Safety and Homeland Security Bureau
445 12th St., S.W.
Washington, DC 20554

RE: Comment on the Request for Waiver of the December 31, 2016 700 MHz Narrowband
Deadline filed by the State of Arkansas; **PS Docket 06-229**

Dear Sir or Madam,

The State of Arkansas has filed a petition to operate the Arkansas Wireless Information Network (AWIN) in the 700 MHz narrowband spectrum utilizing the current 12.5 kHz channel efficiency through December 31, 2024. While the State of Arkansas went to a fully operational status with the AWIN system in 2007, the City of Fort Smith only recently completed full implementation of the system.

The City of Fort Smith utilizes the AWIN system for daily communications for its police, fire, utilities, sanitation and transit departments. Each of these departments serves a vital role in responding to critical incidents and natural or manmade disasters, thus contributing to the public safety of our citizens. As the second largest city in Arkansas, implementation of the AWIN system represents a substantial financial investment, borne by the taxpayers of the City of Fort Smith. The equipment currently in use by the City of Fort Smith will not support a reduction to 6.25 kHz channel efficiency and, as a result, much of this equipment would have to be replaced in order to comply with the current deadline of the next phase of narrowbanding, scheduled for December 31, 2016. A requirement to replace this equipment to meet this deadline would cause a prematurely and artificially reduced economic lifespan for the investment we've recently made.

The communications network within the City of Fort Smith represents over 400 subscribers among the various departments, and the cost to replace all the equipment such that would be necessary to comply with this deadline would cost the City several million dollars. In

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our current economic environment, such a significant financial burden on the citizens of Fort Smith would create an undue financial hardship on the City. However, if the petition filed by the State of Arkansas was granted and the deadline extended until December 31, 2024, a significant portion of this equipment will have already been replaced with compliant equipment as a matter of normal lifecycle replacement.

Another point of concern is the limited availability of equipment that would be compliant with the 6.25 kHz channel efficiency requirement. Such equipment has only recently become available on the market and it is highly probable that the demand brought forth by the 2016 deadline will exceed available supply.

For the reasons detailed here, the City of Fort Smith strongly urges your agency to approve the petition submitted by the State of Arkansas and grant the waiver of the deadline until December 31, 2024.

Sincerely,

A handwritten signature in blue ink that reads "Ray Gosack". The signature is written in a cursive, flowing style.

Ray Gosack
City Administrator